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March 2, 2012

VIA ECJ AND FACSIMILE

The Honorable Michael A. Shipp
Martin Luther King, Jr.
Federal Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

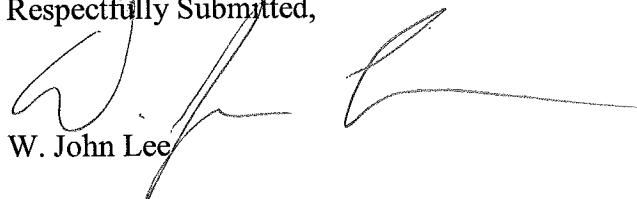
Re: *Sally White v. Smiths Detection, Inc. et al*, No. 2:10-cv-04078-SRC-MAS

Dear Judge Shipp:

We write on behalf of Defendants in response to the Court's Order dated February 24, 2012 (Dkt. No. 100) regarding the discovery that remains to be completed in this case. Unfortunately, the parties could not submit a joint letter to the Court because Plaintiff insisted on including additional arguments in support of her informal motion to compel in the joint submission, which Defendants could not endorse for obvious reasons.

To date, the parties have not conducted any depositions as there is a dispute over the scope of written and document discovery. These differences are set forth in the parties' respective letter briefs to the Court regarding Plaintiff's informal motion to compel. See Dkt. Nos. 96, 98. The parties have, however, scheduled the deposition of the Plaintiff for March 9, 2011. In addition, the parties have agreed that they would discuss a potential resolution of this matter after the Plaintiff's deposition. If the parties are unable to resolve this matter, the parties will work to schedule the depositions requested by Plaintiff of four defense witnesses (Stephen Phipson, Pennie Boyko, Christopher Gane, and Robin Falcone) for sometime in April or May.

Respectfully Submitted,



W. John Lee

c: Ellen O'Connell, Esquire (via e-mail only)
Jyotin Hamid, Esquire (via e-mail only)